

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al., §	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0844-XR
	§	(Consolidated Cases)
GREGORY ABBOTT, et al.	§	
<i>Defendants.</i>	§	

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**DEFENDANTS DYANA LIMON-MERCARDO<sup>1</sup> AND JOSÉ GARZA’S RULE 26(a)(3)  
PRETRIAL DISCLOSURES**

TO THE HONORABLE COURT:

Defendants Dyana Limon-Mercado and José Garza (collectively, “Travis County Defendants”) pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, make their pretrial disclosures. The Travis County Defendants reserve the right to amend their disclosures to include witnesses or exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties’ disclosures made under Rules 26(a)(3)(A)(i)-(iii).

**A. WITNESSES (Rule 26(a)(3)(A)(i))**

**Witnesses the Travis County Defendants expect to present:**

None

**Witnesses the Travis County Defendants will call if the need arises:**

None.

The following witnesses will testify, if necessary, regarding attorneys’ fees and costs:

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<sup>1</sup> Travis County Clerk Dyana Limon-Mercado took office as the duly elected Travis County Clerk effective January 1, 2023. Pursuant to Federal Rule of Civil Procedure 25(d), Travis County Clerk Limon-Mercado is automatically substituted as a party herein.

Leslie W. Dippel, Attorney Fees Expert  
Amy S. Ybarra, Attorney Fees Expert  
Anthony J. Nelson, Attorney Fees Expert  
c/o Travis County Attorney's Office  
P.O. Box 1748  
Austin, Texas 78767

**B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))**

None. However, the Travis County Defendants reserve the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii).  
*See Fed. R. Civ. P. 32(a)(6).*

**C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))**

**Documents and other exhibits the Travis County Defendants expect to offer:**

None.

**Documents and other exhibits the Travis County Defendants will offer if the need arises:**

None.

Respectfully submitted,

**DELIA GARZA**

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**ATTORNEYS FOR DEFENDANTS  
DYANA LIMON-MERCADO AND JOSÉ  
GARZA, IN THEIR OFFICIAL CAPACITIES  
AS TRAVIS COUNTY CLERK, AND  
DISTRICT ATTORNEY, RESPECTIVELY.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this motion was served through the Court's CM/ECF Document Filing System upon each attorney of record and the original upon the Clerk of Court on this the 28<sup>th</sup> day of July, 2023.

/s/ Anthony J. Nelson  
ANTHONY J. NELSON  
Assistant County Attorney